

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
CHARLENE JOY KEYS,
Defendant.

NO. CR18-061 RSL
[PROPOSED]
PROTECTIVE ORDER

This matter comes before the Court on the stipulated motion for a protective order regarding the discovery materials produced to the Defendant named above. Having considered the entirety of the record and files herein, the Court finds that based upon the motion and for good cause shown,

IT IS HEREBY ORDERED that copies of documents pertaining to clients of Keys Research (“Client Documents”) shall be produced to defense counsel, but shall not be disseminated to the Defendant unless first redacted of all personal identifying information.

IT IS HEREBY FURTHER ORDERED that the Defendant, her respective defense counsel, and others to whom disclosure of the content of discovery may be necessary to assist with the preparation of the defense case, shall not disclose the Client Documents other than as necessary for the preparation of their defense, and in subsequent appellate proceedings, if necessary, unless first redacted of all personal identifying information.

1 IT IS FURTHER ORDERED that if Client Documents are distributed by the
2 Defendant, defense counsel, or others acting on behalf of the Defendant for purposes of
3 preparing a defense or for investigatory purposes, all such copies will be collected by
4 defense counsel and returned to the government or destroyed at the termination of the
5 prosecution of this matter.

6 IT IS FURTHER ORDERED that any party seeking to file pleadings or evidence that
7 may identify clients of Keys Research must first redact those documents in keeping with the
8 Local Rules or file those materials under seal.

9 Nothing in this order prohibits defense counsel from reviewing, or showing the Client
10 Documents to the Defendant, and others to whom disclosure may be necessary to assist with
11 the preparation of their defense, and in subsequent appellate proceedings, if necessary.

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13 Dated this 31st day of May, 2018.
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16 HON. ROBERT S. LASNIK
17 United States District Judge

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19 Presented by:

20 /s/ André M. Peñalver
21 ANDRÉ M. PEÑALVER
22 Assistant United States Attorney
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